1	Jeffrey L. Hartman, Esq. Michael S. Budwick, Esq. #938777 – Admitted <i>Pro Hac Vice</i>				
2	Nevada Bar No. 1607	Solomon B. Genet, Esq. #617911 – Admitted <i>Pro Hac Vice</i>			
3	HARTMAN & HARTMAN 510 W. Plumb Lane, Suite B	Meaghan E. Murphy, Esq. #102770 – Admitted <i>Pro Hac Vice</i> Gil Ben-Ezra, Esq. #118089 – Admitted <i>Pro Hac Vice</i>			
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8		sgenet@melandbudwick.com			
9	mmurphy@melandbudwick.com gbenezra@melandbudwick.cm				
	abrody@melandbudwick.com				
10	Attorneys for Christina W. Lovato, Chapter 7 Trustee				
11	UNITED STATES BANKRUPTCY COURT				
12	DISTRICT OF NEVADA				
13	In re			: BK-19-50102-gs	
14	DOUBLE JUMP, INC.		(Chapter 7)		
15	Debtor.		Substantively consolidated with:		
	Deotor.		19-50130-gs 19-50131-gs	DC Solar Solutions, Inc. DC Solar Distribution, Inc.	
16				DC Solar Freedom, Inc.	
17					
18	CHRISTINA W. LOVATO,		Adversary No.	: 22-05001-gs	
19	Plaintiff,			ON AND PROTECTIVE ARDING PRODUCTION	
20	v.		OF DOCUME		
21	AHERN RENTALS, INC. and XTREME		Hearing Date:		
22	MANUFACTURING, LLC,		Hearing Time	: N/A	
23	Defendants.				
24	This Stipulation (" <i>Stipulation</i> ") is entered into by and between Meaghan E. Murph				
25	Meland Budwick, P.A. on behalf of Christina W. Lovato, Trustee ("Trustee") and Ke				

This Stipulation ("Stipulation") is entered into by and between Meaghan E. Murphy of Meland Budwick, P.A. on behalf of Christina W. Lovato, Trustee ("Trustee") and Kevin McCarrell of Fox Rothschild LLP on behalf of Defendants Ahern Rentals, Inc. ("Ahern") and Xtreme Manufacturing, LLC ("Xtreme" and together with Ahern, the "Defendants") (the Defendants and the Trustee are collectively the "Parties") in the above-captioned adversary

proceeding ("Adversary"). The Bankruptcy Court order approving the Stipulation (the "Protective Order") shall be deemed effective on the date it is entered by the clerk of the Court (the "Effective Date").

- 1. On May 20, 2020, the Trustee and Xtreme entered into a Stipulation and Protective Order Regarding Production of Documents, which was filed in the Lead Case on June 2, 2020 (Docket No. 1884 in 19-50102-gs) (the "*Xtreme Stipulation*").
- 2. On May 21, 2020, the Court entered its Order approving the Xtreme Stipulation in the Lead Case (Docket No. 1918 in 19-50102-gs) (the "*Xtreme Protective Order*").
- 3. On June 1, 2020, the Trustee and Ahern entered into a Stipulation and Protective Order Regarding Production of Documents, which was filed in the Lead Case on June 2, 2020 (Docket No. 1915 in 19-50102-gs) (the "Ahern Stipulation" and together with the Xtreme Stipulation, the "Prior Stipulations").
- 4. On June 1, 2020, the Court entered its Order Approving Stipulation and Protective Order Regarding Production of Documents in the Lead Case (Docket No. 1918 in 19-50102-gs) (the "Ahern Protective Order" and together with the Xtreme Protective Order, the "Prior Protective Orders").
- 5. On August 26, 2022, the Trustee propounded her First Requests for Production of Documents upon Defendants, which seeks the production of certain documents from the Defendants, and may propound future discovery requests seeking additional documents.
- 6. The Parties have engaged in good faith discussions and have agreed that the terms of the Prior Stipulations and Prior Protective Orders shall apply in equal force and effect to the Defendants' production of documents in response to the Trustee's current and future discovery requests in this Adversary Proceeding.

DATED: September 27, 2022. DATED: September 27, 2022.

## MELAND BUDWICK, P.A.

## /s/ Meghan E. Murphy

Meaghan E. Murphy, Esq.

Attorneys for Plaintiff Christina W. Lovato

## FOX ROTHSCHILD LLP

/s/Kevin McCarrell

Kevin McCarrell, Esq.

Attorney for Defendants Ahern Rentals, Inc. and Xtreme Manufacturing, LLC

1	<u>CERTIFICATE OF SERVICE</u>			
2	I certify that on September 27, 2022, I caused to be served the following document(s):			
3	STIPULATION AND PROTECTIVE ORDER REGARDING PRODUCTION OF DOCUMENTS			
4	I caused to be served the above-named document(s) as indicated below:			
5	✓ a. Via ECF to:			
6	ALEXANDER E. BRODY abrody@melandbudwick.com			
7	<u>ltannenbaum@melandbudwick.com</u> <u>ltannenbaum@ecf.courtdrive.com</u>			
8	mrbnefs@yahoo.com MICHAEL S. BUDWICK mbudwick@melandbudwick.com			
9	ltannenbaum@melandbudwick.com ltannenbaum@ecf.courtdrive.com			
10	MARK J. CONNOT <u>mconnot@foxrothschild.com</u> <u>dloffredo@foxrothschild.com</u> SOLOMON B. GENET <u>sgenet@melandbudwick.com</u>			
	<u>ltannenbaum@melandbudwick.com</u> <u>ltannenbaum@ecf.courtdrive.com</u>			
11	JEFFREY L HARTMAN <u>notices@bankruptcyreno.com</u> <u>abg@bankruptcyreno.com</u>			
12	CHRISTINA W. LOVATO <u>trusteelovato@att.net NV26@ecfcbis.com</u> M. KEVIN MCCARRELL kmccarrell@foxrothschild.com			
13	MEAGHAN E. MURPHY mmurphy@melandbudwick.com			
14	✓ b. Direct Email to:			
15	U. Direct Email to.			
16	Mark J. Connot, Esq. Kevin M. Sutehall, Esq.			
17	Colleen E. McCarty, Esq.			
18	mconnot@foxrothschild.com			
19	ksutehall@foxrothschild.com cmccarty@foxrothschild.com			
20	✓ c. Via Mail Service: Regular, first-class United States mail, postage fully pre-paid			
21	addressed to:			
22	Ahern Rentals, Inc.			
23	1401 Mineral Ave.			
24	Las Vegas, NV 89106			
	Xtreme Manufacturing, LLC			
25	8350 Eastgate Rd. Henderson, NV 89015			
26	DATED: Sentember 27, 2022			
27	DATED: September 27, 2022.			
28	<u>/s/ Meaghan E. Murphy</u> Meaghan E. Murphy, Esq.			

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